

425 SIXTH AVENUE, SUITE 1100
PITTSBURGH, PA 15219-1811

T: 412.281.4783

F: 412.281.1896

www.alleghenyconference.org

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August 2, 2007

The Honorable Tom Corbett and Lobbying Disclosure Regulation Committee:

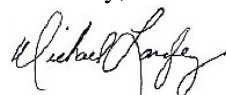
Please accept this letter from the Allegheny Conference on Community Development into the record for today's public hearing on the draft regulations governing Pennsylvania's Lobbying Disclosure Regulations (Act 134 of 2006) proposed by your Committee. The Allegheny Conference works in collaboration with public and private sector partners to stimulate economic growth and improve the quality of life in southwestern Pennsylvania.

We have registered with the Department of State as required by the Act, and have submitted two quarterly reports. The vast majority of the expenses we have disclosed in these two quarterly reports are indirect lobbying expenses, attributable primarily to personnel expenses for research and monitoring activities. As you know, the definition of personnel expenses in the Act includes the term 'research and monitoring staff'. An organization such as ours conducts a significant amount of **research** on issues critical to the economic well-being of our region and the Commonwealth. We routinely **monitor** regulatory and legislative activities. Nearly all of the issues of importance to our local and state economy may at some time involve legislative action.

It does not seem that the intent of the lobbying disclosure rules was to capture so much of the research and monitoring activities common to public policy and economic development organizations. This wide net introduces a new and significant administrative burden to already-lean nonprofit organizations. For example, in 2007 the Allegheny Conference has already invested a minimum of 265 hours of staff time in addition to outside legal costs in interpreting this aspect of the new rule and developing the internal processes to comply – resources that could be spent on improving the economy and quality of life in southwestern Pennsylvania.

In developing the final regulations, please consider minimizing the ambiguity imposed on research and monitoring activities common to many public policy-related organizations across the Commonwealth. In addition, please consider an exemption or simplified reporting requirement for the research and monitoring activities of public policy-related nonprofit organizations.

Sincerely,



Michael Langley
CEO